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5 Attorneys for Defendants
INNOVATIVE STYLING OPTIONS, INC.,
6 AND ZOTOS INTERNATIONAL, INC.

7
8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11
12 GINA KILPELA, an individual, on behalf of
themselves and all others similarly situated,

13 Plaintiff,

14 v.

15 INNOVATIVE STYLING OPTIONS, INC.,
16 AND ZOTOS INTERNATIONAL, INC.

17 Defendants.
18

Case No. 3:15-cv-2464-H-JMA

**JOINT NOTICE OF SETTLEMENT AND
STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT**

19 PLAINTIFF, Gina Kilpela, by and through her counsel of record, Todd D. Carpenter of
20 Carpenter Law Group, and DEFENDANTS, Innovative Styling Options, Inc. and Zotos
21 International, Inc. ("Zotos"), by and through their counsel of record, Karen P. Kimmey of Farella
22 Braun and Martel LLP, hereby state as follows:

23 WHEREAS, the Complaint was filed in the above captioned matter on or about October
24 30, 2015;

25 WHEREAS, this Court granted the parties' joint motions to extend time to respond to the
26 Complaint up to and including February 22, 2016;

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JOINT NOTICE OF SETTLEMENT AND
STIPULATION TO EXTEND TIME TO RESPOND
TO COMPLAINT - CASE NO. 15-cv-2464-H-JMA

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1 WHEREAS, the parties have executed a binding settlement and release agreement;

2 WHEREAS, pursuant to the terms of that settlement agreement, a stipulation of dismissal
3 with prejudice shall be filed upon payment of the settlement consideration;

4 WHEREAS, payment of the settlement consideration is due within 30 days of execution
5 of the settlement and release agreement;

6 WHEREAS, the parties anticipate that a stipulation of dismissal will be filed on or about
7 March 14, 2016;

8 WHEREAS, the parties request a further extension of the deadline to respond to Plaintiff's
9 Complaint until the time for payment of the settlement consideration and filing of a stipulation of
10 dismissal has expired;

11 NOW, THEREFORE, Plaintiff and Defendants stipulate and agree that Defendants shall
12 have through and until March 22, 2016 to respond to the Complaint, if necessary.

13 Dated: February 17, 2016

CARPENTER LAW GROUP

14 By: /s/ Todd D. Carpenter

15 Todd D. Carpenter

16 Attorneys for Plaintiff Gina Kilpela

17 Dated: February 17, 2016

FARELLA BRAUN + MARTEL LLP

18 By: /s/ Karen P. Kimmey

19 Karen P. Kimmey

20 Attorneys for Defendants Innovative Styling
Options, Inc. and Zotos International, Inc.

21 **ATTESTATION REGARDING SIGNATURES**

22 I, Karen Kimmey, attest that all signatories listed, and on whose behalf the filing is
23 submitted, concur in the filing's content and have authorized the filing.

24
25 Dated: February 17, 2016

By: /s/ Karen P. Kimmey